

**ABELSON LAW OFFICES**

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Attorney for Debtor

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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In re: : Chapter 13  
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:   
**MICHAEL J. SALVATORE, JR.** :   
:   
: CASE NO: 23-10910 (CMG)  
:   
Debtors : **CERTIFICATION OF COUNSEL IN**  
: **SUPPORT OF MOTION TO SELL**  
: **PROPERTY RESIDENCE**  
:   
:   
: Hearing Date: August 16, 2023 @ 9:00 a.m.  
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Steven J. Abelson, hereby certifies as follows:

1) I am an attorney at law of the State of New Jersey and this District and am charged with the handling of the above captioned matter on behalf of the debtor.

2) This certification is made to approve the short sale of this the rental property owned by Debtor in Newark. The property was valued in the Bankruptcy petition in early this year at \$ 275,000- given a year of attempting to sell sufficient to pay off the 3 mortgages and City of Newark lien. A contract has now been received but is insufficient to payoff the 3 mortgages. A copy of the contract is attached as "*Exhibit A*".

3) This sale is consistent with the Debtor's modified plan, presently scheduled for confirmation

on 8/9/23. It calls for the surrender of the property or treatment of the liens on the property outside of the bankruptcy plan.

4) After closing costs, it is Debtor's intent to pay all proceeds to Wells Fargo Bank consistent with the proposed closing statement. (Exhibit B)

5) These exact figures as anticipated for distribution are set forth in the schedule attached as *"Exhibit C"*.

**6) The debtor is not related to the purchaser and has no business relationship with the party. The party is a disinterested third party in a bona fide fair market purchase of this real estate.**

7) Debtor is not aware of any liens and/ judgments against this property which attach to the property, except for the City of Newark which has agreed to release same.

8) Application will be made at the time of closing for the payment from the closing proceeds for the professional real estate commission in the amount of \$ 16,500 to Option 1 Realty and to Debtor's Attorney Malhotra & Associates for \$ 1500.

9) At this time, it is requested that the distribution be permitted as set forth on the attached schedule at closing.

I hereby certify that the foregoing statements are true. If any of the foregoing statements are wilfully false, I realize that we are subject to punishment.

/s/ Steven J. Abelson  
STEVEN J. ABELSON

Dated: 7/19/23